

restriction requirement, nor Applicant's election of claims 87-269, in any way. This is clearly improper.

If the restriction requirement is withdrawn, the Examiner should provide an appropriate indication that the restriction requirement is withdrawn, and provide rejections of all pending claims 1-269.

If the restriction requirement is not withdrawn, the Examiner should provide rejections or indications of allowance for each of claims 87-269, as elected by Applicant, and should indicate that claims 1-86 are withdrawn as being directed to non-elected claims.

In either of these cases, however, the present Office Action is fundamentally flawed, because it fails to address either the full claim set 1-269 or the elected claim set 87-269, and therefore should be withdrawn.

On page 7 of the present Office Action, the Examiner in paragraph 5 states that "double rejection is withdrawn." This is unclear. Does it mean the previous restriction requirement is withdrawn? If so, as indicated above, the Office Action should address claims 1-269, but it only addresses claims 1-86. Does it mean a previous rejection was withdrawn? There has been no double patenting rejection in the present application. Accordingly, the indication that "double rejection is withdrawn" renders the present Office Action effectively incoherent, and should be clarified at the very least.

Applicant also notes that the present Office Action at page 1 thereof, in the summary section, indicates that claims 1-269 are pending, and that claims 1-269 are rejected. This would tend to suggest that the previous restriction requirement has been withdrawn. The substance of the Office Action, however, as indicated previously, provides a rejection of only claims 1-86. Again, this is improper, because the Office Action must provide a suitable indication of rejection or allowability for each and every pending claim, and the present Office Action fails to address claims 87-269 in any way.

For the reasons identified above, the present Office Action is believed to be fundamentally flawed, and should be withdrawn. A new non-final Office Action addressing the status of the previous restriction requirement, and indicating the appropriate status of the pending claims in a clear and understandable manner, should be issued.

Notwithstanding the foregoing traversal, Applicant will address the objections raised by the Examiner to the drawings and claims 1-86.

With regard to the drawings, the Examiner argues that certain elements recited in the claims are not shown in the drawings. Applicant respectfully traverses the objection.

Applicant initially notes that the regulation in question, 37 C.F.R. §1.83(a), does not require that each and every element recited in each and every claim be shown in a drawing. Instead, the regulation simply states that “the drawing . . . must show every feature of the invention specified in the claims.” It is believed that the present drawings do in fact show every feature of the invention. For example, the Examiner argues that the “expert” referred to in claim 1 is not shown in the drawings. However, claim 1 is directed to a method for linking at least one client with at least one expert. FIG. 1 of the drawings shows a client device 1 and an expert device 2, with a link 9 established between said devices. See the specification at, for example, page 9, lines 22-24. Thus, the feature of linking at least one client with at least one expert is clearly shown in the drawings, as required by 37 C.F.R. §1.83(a).

The other drawing objections raised by the Examiner are similarly deficient. For example, the Examiner argues that certain recitations of particular client devices, such as an infrared wireless device, a telephone, a softphone, a facsimile machine, a facsimile server, a PC card, and so on, are not shown in the drawings. However, each and every one of these recited client devices is in fact shown, by the general representation of client device 1 in FIG. 1. The box identified as client device 1 in FIG. 1 can be any one of the recited client devices. Again, 37 C.F.R. §1.83(a) does not require that Applicant show a separate drawing element for each different type of recited client device. A suitable general representation that encompasses any such device is certainly acceptable. The same can be said of the particular telephony protocols recited in claim 47. The general link 9 shown in FIG. 1 can encompass any of these protocols, and accordingly satisfies the requirements of 37 C.F.R. §1.83(a).

With regard to the claim objections, the Examiner argues that certain acronyms utilized in the claims are somehow unclear. Applicant respectfully disagrees. These acronyms are commonly used and have well-understood meanings that will be readily apparent to one skilled in this art. There is no requirement that a claim cannot use an otherwise clear and well-understood acronym

simply because it is an acronym. Those skilled in the art will immediately recognize that DCIU refers to data communication interface unit, SMTP refers to simple mail transfer protocol, MIME refers to multipurpose Internet mail extensions, PMSP refers to preliminary message security protocol, SNMP refers to simple network management protocol, CCITT refers to International Telegraph and Telephone Consultative Committee, and RFC refers to a request for comment document of the Internet Engineering Task Force (IETF). These acronyms are so widely known and used that they are clear in and of themselves without further definition.

Accordingly, the objections to the drawings and claims are believed to be without merit, and should be withdrawn.

Applicant also notes with regard to the §102(e) rejection that U.S. Patent No. 6,327,363 (hereinafter “Henderson”) fails to meet each and every limitation of independent claim 1 as alleged by the Examiner.

The Manual of Patent Examining Procedure (MPEP), Eight Edition, August 2001, §2131, specifies that a given claim is anticipated “only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference,” citing Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, MPEP §2131 indicates that the cited reference must show the “identical invention . . . in as complete detail as is contained in the . . . claim,” citing Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

The present invention as set forth in independent claim 1 is directed to a method for linking at least one client with at least one expert. The method includes, among other steps, the steps of generating at least one concept based on at least one client inquiry to at least one datasource, comparing the at least one generated concept to at least one expert datasource, selecting at least one expert from the expert datasource based on the comparison of the generated concept to the expert datasource, and linking the expert to the client.

The Henderson reference, in contrast to the invention as set forth in claim 1, describes an arrangement in which a customer that wants to receive service on a given purchased product calls in and simply enters a personal identification number that is provided to the customer at the time of purchase. Based on the entered number, the call is routed to “an appropriate care center.” See the

abstract. Thus, there is no generation of a concept from a client inquiry, nor any comparison of the generated concept to an expert datasource in order to select an expert, as required by the claim. Instead, Henderson teaches routing based on predetermined customer identification numbers, which not only fails to meet the limitations in question, but actively teaches away from them. The Henderson approach appears to require that the system know in advance which service agents are best suited for which customers, and hence fails to provide the advantages associated with the present invention as set forth in claim 1.

Since claim 1 includes one or more limitations which are not met by Henderson, claim 1 is not anticipated by Henderson.

The dependent claims 2-86 are believed allowable for at least the reasons identified above with regard to independent claim 1.

Accordingly, the §102(e) rejection is believed to be improper and should be withdrawn.

In view of the above, Applicant believes that claims 1-269 are in condition for allowance, and respectfully requests withdrawal of the previous restriction requirement, the drawing and claim objections, and the §102(e) rejection.

Respectfully submitted,



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